

**PROCEDURE FOR THE INSTITUTIONAL REVIEW AND CONCURRENCE
OF SAFETY BASIS DOCUMENTS
FOR LLNL CATEGORY 2 AND 3 NUCLEAR FACILITIES**

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Procedure for the Institutional Review and Concurrence of Safety Basis Documents for LLNL Category 2 and 3 Nuclear Facilities

1.0 Introduction

The purpose of this procedure is to establish and define the process for LLNL institutional review and concurrence of Category 2 and 3 nuclear facility safety basis (SB) documents for transmittal to DOE. This procedure specifically addresses Item CA3 of the Nuclear Facility Authorization Basis Corrective Action Plan.

2.0 Scope

This section describes the scope of institutional review and concurrence.

2.1 Documents Requiring Review

Institutional review and concurrence are conducted for any written document or correspondence to DOE that establishes, modifies, or otherwise affects the SB of a Category 2 or 3 nuclear facility, and any submittal that addresses generic (i.e., Lab-wide) SB requirements for Category 2 or 3 nuclear facilities. Institutional reviews are not required for routine operating issues, activities within the existing SB, negative Unreviewed Safety Question (USQ) Determinations, or USQ screenings. Review is completed and concurrence provided before submittal of the material to DOE.

2.2 Nature of Review

Institutional review is conducted at a level of detail appropriate to the document to be submitted. The primary focus of review is consistency across the nuclear facilities in assumptions and approaches and compliance with institutional requirements. Review is considered a high-level review with an institutional perspective and should:

- Consider issues such as
 - Cross-directorate or cross-facility impacts.
 - Integration of hazard analyses.
 - Adherence to institutional commitments.
- Focus on issues that could be overlooked in facility-specific reviews.
- Help improve the SB documents submitted to DOE by demonstrating institutional involvement in the SB process.

Institutional review is not intended to duplicate or supersede the comprehensive independent technical review normally completed as part of the document preparation and quality assurance (QA) processes and typically is conducted in parallel with such reviews. Furthermore, institutional review is not intended to duplicate or eliminate the need for line management involvement in, and responsibility for, the timely completion of SB document submittals. However, the institutional review may include the

confirmation of selected calculations or performance of an independent calculation if the calculation represents an important concurrence issue for the SB document.

This review does not fulfill the following:

- Requirements for independent technical review as described in the *Safety Basis Calculation Procedure for Category 2 and 3 Nuclear Facilities*.
- Other obligations under applicable QA or safety programs.
- The responsibilities of line management.

3.0 Responsibilities

This section describes the responsibilities of personnel involved in institutional review and concurrence.

3.1 Deputy Director for Strategic Operations

Responsibility for institutional review and concurrence of Category 2 and 3 nuclear facility SB documents resides with the Deputy Director for Strategic Operations (DDSO). The DDSO conducts the review and provides written documentation of concurrence with SB documents (or delegates this responsibility) in accordance with this procedure. The DDSO relies on the Authorization Basis (AB) Section of the Hazards Control Department to perform the required review, and has delegated primary concurrence signature authority to the AB Section Leader.

The DDSO from time to time may delegate this authority to other institutionally knowledgeable individuals (in the Hazards Control Department or another organization) to ensure that adequate backup capability always exists. The DDSO effects delegation by signing a letter of delegation of concurrence signature authority for the qualified individual. Concurrence signature authority shall not be further sub-delegated. The responsibility for SB document concurrence remains with the DDSO, and any individual with delegated authority has the responsibility to keep the DDSO informed of all concurrence issues related to the SB of nuclear facilities.

3.2 Nuclear Facility Managers

A Category 2 or 3 Nuclear Facility Manager has the responsibility to coordinate the institutional review of SB documents with the AB Section Leader according to Section 4.0 of this procedure.

3.3 Authorization Basis Section Leader

The AB Section Leader in the Hazards Control Department is delegated primary concurrence signature authority from the DDSO. When so delegated, the AB Section Leader is responsible for performing institutional review of SB documents. This responsibility includes:

- Providing a reviewer who is independent of the document preparers.

- Ensuring that review is conducted in a timely manner, with minimal impact to facility operations.

3.4 Institutional Concurrence Reviewer

The AB Section Leader may assign qualified safety analysts to complete institutional review as appropriate. The responsibility of the reviewer is to:

- Ensure that institutional requirements are consistently and uniformly implemented across all the institutional facilities.
- Ensure consistency in assumptions and approaches used in LLNL SB documents.

4.0 Sequence and Coordination of the Institutional Review Process

The review and concurrence process varies depending on the type of submittal under consideration. Three types of submittals are reviewed: long-term, intermediate-term, and urgent. Each type is discussed below.

- 1.) Long-term submittals are defined as those with a planning horizon of many months and that are developed with a well-defined schedule and project plan. An example of such a submittal would be a Documented Safety Analysis (DSA) for a new facility or a DSA update for an existing facility.

For submittals of this type, institutional review is conducted in parallel with development of the submittal and is planned into the schedule for the project. With active coordination between the Facility Manager and the AB Section Leader or Institutional Concurrence Reviewer, final review of the submittal before its transmittal to DOE should be completed within a few days or as otherwise agreed in the project schedule.

- 2.) Intermediate-term submittals are defined as those with a time horizon of at least several weeks. An example is a revision to a facility's Technical Safety Requirements.

For submittals of this type, institutional review normally starts shortly after initiation of efforts to develop the submittal and is completed in the last days before transmittal. The time required for such review is agreed upon between the Facility Manager and the AB Section Leader or Institutional Concurrence Reviewer according to the nature and scope of the document.

- 3.) Urgent or emergency submittals are those requiring a response within two weeks or less (e.g., a few days). Examples are Potentially Inadequate Safety Analyses and responses to DOE correspondence that places immediate constraints on facility operations.

For submittals of this type, the Facility Manager notifies the AB Section Leader as soon as practicable after initiation of efforts to develop the submittal. The institutional review is conducted in parallel with the completion of the submittal

and immediately prior to transmittal. To ensure that institutional concurrence is always available, the DDSO maintains a list of individuals, other than the AB Section Leader, to whom concurrence signature authority has been delegated.

5.0 Documentation of Institutional Review and Concurrence

The AB Section Leader or Institutional Concurrence Reviewer communicates the results of institutional reviews to the Facility Manager and clearly identifies comments or issues that must be resolved before submission. If no such issues are identified, or if they have been satisfactorily resolved, concurrence is documented and provided by the DDSO (or designee) in the form of a memo, letter, signature on the document approval sheet, or email. A record of the concurrence review findings is maintained in the AB Section central library.

6.0 Technical Assistance for Institutional Review

Review support may be provided by members of the AB Section, other LLNL staff, or subcontractors requested by the AB Section Leader or the DDSO. Actual concurrence, however, is the responsibility of the signing individual and, ultimately, the DDSO. At every step, the independence of the reviewers must be maintained.

7.0 Dispute Resolution

In the event of disagreements about the readiness of SB documents for submittal to DOE, the Facility Manager and the AB Section Leader or Institutional Concurrence Reviewer work together to resolve such disagreements in a timely manner. If this process does not resolve an issue, the DDSO and the facility Associate Director (or designee) provide direction.

8.0 References

1. *Nuclear Facility Authorization Basis Corrective Action Plan*, UCRL-ID-138652, June 28, 2000.
2. Title 10, Code of Federal Regulations, Part 830, "Nuclear Safety Management," Federal Register, Volume 66, Number 7, January 10, 2001.